

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	19-cr-10081-IT
)	
v.)	
)	
11. JORGE SALCEDO,)	
)	
Defendant)	

ASSENTED-TO MOTION OF DEFENDANT JORGE SALCEDO TO MODIFY CONDITIONS OF RELEASE

Defendant Jorge Salcedo hereby moves this Court to modify his conditions of pretrial release to substitute an unsecured appearance bond in the amount of \$50,000 in place of the current bond of \$250,000 secured by a full deeding of his residence in Los Angeles. Mr. Salcedo seeks to sell his residence to obtain funds to support his family and for defense costs. He agrees that after satisfying the mortgage and sale expenses, he will either place \$200,000 of the proceeds of the sale in an escrow with interest at the direction of the U.S. Attorney's Office, assuming his personal account at City National Bank is unfrozen by the government; or alternatively, will place \$200,000 minus the amount seized by the government from the City National Bank in an escrow with interest. The escrowed amount will either be forfeited or returned to Mr. Salcedo depending on the outcome of the matter.

CONCLUSION

For these reasons, Mr. Salcedo respectfully requests that his conditions of release be modified to vacate the current bond of \$250,000 secured by the residence, and to substitute an unsecured appearance bond in the amount of \$50,000.

RULE 7.1 CERTIFICATION

Pursuant to Rule 7.1, I hereby certify that I this day conferred with AUSA Eric Rosen and the U.S. Probation Service, who agree to the proposed modification.

Dated: March 25, 2019

By: /s/ Susan G. Winkler
Thomas C. Frongillo
BBO #180690 |(617) 401-7289
Susan G. Winkler
BBO # 530682 |(617) 902-0075
Pierce Bainbridge Beck Price & Hecht LLC
One Liberty Square, 13th Floor
Boston, MA 02109
tfrongillo@piercebainbridge.com
swinkler@piercebainbridge.com

Certificate of Service

I hereby certify that I this day provided the foregoing pleading to counsel of record by ECF notice.

March 25, 2019

/s/ Susan G Winkler
Susan G. Winkler